

# EXHIBIT 2

## Douglas Handshoe

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**From:** Douglas Handshoe <earning04@gmail.com>  
**Sent:** Monday, July 09, 2018 3:12 PM  
**To:** 'foodvacation Canada'  
**Subject:** RE: deposition

Mr. Leary

I was unable to reorganize my schedule to free up Thursday but I did some additional research on the topic in general.

You obviously have been reluctant to disclose your exact location and conducting an English deposition before a Spanish Notary is not ideal. I see that Rule 28(D) would allow the Oath to be administered Telephonically should the Court order it. Written stipulations would also be an option but I only found one old case which allowed it for Telephonic oaths. This way your location can remain your secret.

I propose going to the Court with an agreed Motion under Rule 28 for the Magistrate to commission the firm of Patsy Ainsworth Reporting, Inc. to administer the oath telephonically and transcribe the deposition at my expense. Ms. Ainsworth has several Court Reporters in this area that can handle the task. I would be happy to draw the agreed Motion for filing into the record as well as the Court order should this be agreeable to you.

We still need to agree on a date and a time for the deposition. As of today I have appointments scheduled on July 18 and July 26 that cannot be moved. Any other day those next two weeks works for me.

Please advise.

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**From:** Douglas Handshoe <earning04@gmail.com>  
**Sent:** Monday, July 09, 2018 8:02 AM  
**To:** 'foodvacation Canada' <foodvacation@gmail.com>  
**Subject:** RE: deposition

Mr. Leary

Thank you for your reply and cooperation. Thursday is very short notice and while it is not an impossibility it would require I rearrange my work schedule as well as find a notary there in Spain to administer the oath and swear an affidavit. I did google the area and there are several notaries in your area.

We need to nail down a few important details as Girona is 7 hours ahead of US Central Time. The transcriptionist here usually start their day at 9 AM, which would be 4 pm your time. My understanding is the local custom there is to close for a few hours midday and be open later in the evening. I noted several notary offices there were open until 7pm local time. I think that beginning at 9AM US Central (4PM in Girona) should work out well for everyone.

It may be easiest for you to appear at the office of whatever notary I hire to conduct the deposition.

I should know later today whether this coming Thursday is feasible. Please develop a list of dates between the 16<sup>th</sup> and 27<sup>th</sup> in case Thursday is a no go.

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**From:** foodvacation Canada <[foodvacation@gmail.com](mailto:foodvacation@gmail.com)>  
**Sent:** Saturday, July 07, 2018 4:07 PM  
**To:** Douglas Handshoe <[earning04@gmail.com](mailto:earning04@gmail.com)>  
**Subject:** deposition

Mr. Handshoe:

I can be available this coming Thursday, Girona, Girona, Spain.

Charles Leary